

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No. 1:15-CV-559

CITY OF GREENSBORO, et al.,)
)
)
Plaintiffs,)
)
)
v.) MOTION TO INTERVENE
)
)
GUILFORD COUNTY BOARD OF)
ELECTIONS,)
)
)
Defendant.)

Melvin Alston, Jean Brown, Hurley Derrickson, Stephen Golimowski, Wayne Goodson, Earl Jones, Sharon Kasica, Jim Kee, and William Clark Porter (“Intervenors”) come before this Court and respectfully move to intervene as Defendants in this action pursuant to Federal Rules of Civil Procedure 24(a), or, alternatively, Federal Rule of Civil Procedure 24(b). Concurrently with this Motion to Intervene, the Intervenors have submitted a memorandum setting forth the factual and legal grounds for this Motion and a responsive pleading in compliance with Rule 24(c). Intervenors have notified all parties of their intent to intervene in this matter. Defendant Guilford County Board of Elections has represented to the Intervenors that it does not object to intervention.

WHEREFORE, Intervenors respectfully requests that this Court allow intervention in this matter as Defendants and accept the pleading and motions attached hereto.

This 25th day of August, 2015

NARRON, O'HALE AND
WHITTINGTON, P.A.

By: /s/ Benton G. Sawrey

Benton G. Sawrey (#46379)
Attorney for Intervenor-Defendants
Post Office Box 1567
Smithfield, NC 27577
Tel: (919) 934-6021
Fax: (919) 934-6280
bsawrey@nowlaw.com

CERTIFICATE OF SERVICE

The undersigned attorney certifies that this day he has electronically filed the foregoing Motion to

Intervene with accompanying exhibits in the above-titled action with the Clerk of Court using the CM/ECF system, which provided notice of such filing to:

Mark Payne, County Attorney
Guilford County Attorney's Office
Attorney for Defendant Guilford County Board of Elections
PO Box 3427
Greensboro, NC 27402

Jim W. Phillips, Jr.
Brooks, Pierce, McLendon, Humphrey & Leonard, LLP
Attorney for City of Greensboro
Post Office Box 26000
Greensboro, N.C. 27420-6000

Julia C. Ambrose
Brooks, Pierce, McLendon, Humphrey & Leonard, LLP
Attorney for City of Greensboro
Post Office Box 26000
Greensboro, N.C. 27420-6000

Daniel F.E. Smith
Brooks, Pierce, McLendon, Humphrey & Leonard, LLP
Attorney for City of Greensboro
Post Office Box 26000
Greensboro, N.C. 27420-6000

Anita S. Earls
Southern Coalition for Justice
Attorney for Plaintiffs Brandon, Johnson, Johnson, Koritz and Koritz
1415 West Highway 54, Suite 101
Durham, N.C. 27707

Anita S. Earls
Southern Coalition for Justice
Attorney for Plaintiffs Brandon, Johnson, Johnson, Koritz and Koritz
1415 West Highway 54, Suite 101
Durham, N.C. 27707

Respectfully submitted this 25th day of August, 2015

/s/ Benton G. Sawrey
Benton G. Sawrey